April 23, 2024

United States District Court For The Northern District Of Georgia

Julia M Robinson and Kendall J. Hall

2451 Cumberland Pkwy SE Suite 3320 Atlanta Cobb Ga 30339

CASE NO: 23-CV-05655-MHC

Plaintiffs: Julia M Robinson and Kendall J. Hall

Defendants: Memorial Healtcare Systems Inc.

FILED IN CLERK'S OFFICE U.S.D.C. - Atlanta

APR 25 2024

KEYINP. WEIMER, Clerk

Man Deputy Clerk

AMENDED OPPOSITION/OBJECTIONS/RESPONSE TO MEMORIAL HEALTHCARE SYSTEMS AND MARIANA DANET M.D. MOTION TO DISMISS/NOTICE OF HEARING

1. On Exhibit F1 for The Plaintiffs Opposition/Objections/Response motion for Florida Atlantic University (FAU) an email copy sent to DHHS OCR from The Plaintiff Julia M. Robinson letting them know she did administrative complaints and why dated October 25, 2021. Exhibit F2 is a print out from Piedmont Hospital in Peachtree City Ga. Dated March 5, 2022 after The Plaintiff did complaints with DHHS OCR. This was a suggestion and subliminal threat that The Plaintiff should call for crisis help for mental illness ironically after The Plaintiff did complaints with DHHS OCR. This was in fact a threat because The Plaintiff did complaints with DHHS OCR and THEY KNEW A LAWSUIT WAS SOON COMING AFTER FROM THE PLAINTIFF. This is also proof that The Defendants has/had knowledge and time to prepare for lawsuits coming from The Plaintiff. Under 1983 Constitutional Violations lawsuits The Plaintiff doesn't have to give a federal department warning that they are filing this kind of lawsuit. The Defendants mentioned in their motion to dismiss that The Plaintiffs filed lawsuits before. The Defendants attorneys know and can see in PACER everything they want and need to see for anything legal for cases. The Defendants had knowledge of The Plaintiffs filing before and The Defendants had time to prepare for This current lawsuit. No attorney can say they didn't have time to prepare, they all knew even if they pretended like they didn't know, they knew. Attorneys know when Americans go Pro Se', especially if The American is Black African American.